

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

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|-----------------------------------|---|----------------------|
| JUAN LOZADA-LEONI | § | |
| PLAINTIFF | § | |
| vs. | § | No. 4:20CV68-RWS-CMC |
| | § | |
| MONEYGRAM INTERNATIONAL, INC. and | § | |
| MONEYGRAM PAYMENT SYSTEMS, INC. | § | |
| DEFENDANTS | § | |

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

COME NOW Plaintiff Juan Lozada-Leoni and Intervenor Kardell Law Group (“KLG”) and file this Joint Motion to Stay all Deadlines and Notice of Settlement, and in support thereof respectfully show unto the Court as follows:

I.

All matters in controversy between Plaintiff and KLG have been settled in principle. The parties are in the process of finalizing the terms of a written settlement agreement. The parties wish to conclude the settlement without burdening the Court with any additional filings and without incurring unnecessary expense. The parties anticipate that they will be able to finalize the written settlement agreement and submit suit dismissal papers within approximately thirty (30) days. Accordingly, Plaintiff and KLG jointly and respectfully request that the Court grant a stay of the proceedings between them, including all deadlines, until October 3, 2021.

II.

The parties submit that good cause exists for granting this agreed motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Intervenor KLG respectfully

request that the Court grant this motion, enter an Order staying all deadlines until October 3, 2021, and for all other relief to which the Plaintiff and Intervenor are entitled.

September 3, 2021

Respectfully submitted,

/s/ Susan E. Hutchison [w/permission W. David Carter]
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CERTIFICATE OF SERVICE

I, W. David Carter, certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ W. David Carter